## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

In re:	§	
	§	
SCOTT VINCENT VAN DYKE	§	Case No. 21-60052
	§	
Debtor.	§	Chapter 7 Case
	<b>§</b>	-

# JOINDER OF EVA S. ENGELHART, CHAPTER 7 TRUSTEE OF THE ESTATE OF ANGLO-DUTCH PETROLEUM INTERNATIONAL, INC., TO CHAPTER 7 TRUSTEE'S OBJECTION TO DEBTOR'S CLAIM EXEMPTIONS

[Relates to Dkt. No. 186]

Eva S. Engelhart ("<u>Engelhart</u>"), in her capacity as Chapter 7 Trustee of the estate of Anglo-Dutch Petroleum International, Inc. ("<u>ADPI</u>"), submits this *Joinder* (the "<u>Joinder</u>") to the *Chapter* 7 *Trustee's Objection to Debtor's Claimed Exemptions* [Dkt. No. 186] (the "<u>Objection</u>"). <sup>1</sup>

### **JOINDER**

1. Engelhart hereby joins in and adopts the arguments offered in the Objection and requests that the Court enter an order limiting the Debtor's exemption of the Real Property to the extent any of the Debtor's interest in the Real Property is attributable to fraudulent proceeds, denying the Debtor's exemption on any nonexempt vehicle, and determining any undisclosed interests in Personal Property not specifically disclosed to be nonexempt.

#### **RESERVATION OF RIGHTS**

2. Engelhart expressly reserves the right to supplement, modify, and amend this Joinder both in writing and orally at any hearing or to otherwise respond to arguments regarding the issues raised in the Objection.

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

Dated: June 23, 2022 Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

#### /s/ William R. Greendye

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